

1 ROB BONTA, State Bar No. 202668  
2 Attorney General of California  
3 CELINE M. COOPER, State Bar No. 167902  
Supervising Deputy Attorney General  
REBECCA M. O'GRADY, State Bar No. 273761  
Deputy Attorney General  
4 600 West Broadway, Suite 1800  
San Diego, CA 92101  
5 P.O. Box 85266  
San Diego, CA 92186-5266  
6 Telephone: (619) 738-9148  
Fax: (619) 645-2581  
7 E-mail: Rebecca.OGrady@doj.ca.gov  
*Attorneys for Defendant*  
8 *California Highway Patrol*

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

ADRIAN ROMERO, JR.,

2:21-cv-01978-JAM-SCR

**Plaintiff,**

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY AND  
DISPOSITIVE MOTION DEADLINES**

V.

**CALIFORNIA HIGHWAY PATROL, and  
DOES 1 through 20, inclusive.**

## Defendants.

Judge: The Honorable Sean C. Riordan

Action Filed: September

Action Filed: September 28, 2021

Plaintiff ADRIAN ROMERO, JR. (“Plaintiff”) and Defendant CALIFORNIA HIGHWAY PATROL (“Defendant”) (collectively, “the Parties”), through their respective attorneys of record, hereby move the Court to extend the deadlines for the discovery cut-off and dispositive motion, and if necessary, the trial and related dates.

WHEREAS, the last day to disclose experts was March 1, 2024.

WHEREAS, the last day to disclose supplemental experts was April 12, 2024.

1           WHEREAS, the last day for discovery in this matter is December 1, 2024.

2           WHEREAS, the last day to file a dispositive motion is January 24, 2025.

3           WHEREAS, the hearing date for a dispositive motion is March 25, 2025.

4           WHEREAS, the final pretrial conference is on May 23, 2025.

5           WHEREAS, the trial in this matter is set for July 7, 2025, at 9:00 a.m.

6           WHEREAS, discovery is ongoing and the Parties have not completed discovery in this  
7 matter.

8           WHEREAS, counsel for CHP went on an unexpected medical leave of absence at the  
9 beginning of April 2024 and did not return until the end of May 2024; Counsel for CHP also went  
10 out on family medical leave from June 21, 2024 until at least July 8, 2024.

11           WHEREAS, this matter was transferred within the Attorney General's office to Deputy  
12 Attorney General Rebecca O'Grady on or around July 24, 2024, as the new counsel for the CHP.

13           WHEREAS, counsel for the CHP, Ms. O'Grady, was engaged in trial in another matter in  
14 San Bernardino from approximately September 3, 2024 until October 23, 2024.

15           WHEREAS, counsel for Plaintiff experienced a medical emergency and is currently out on  
16 an unexpected medical leave of absence.

17           WHEREAS, the Parties agree that they need additional time to conduct discovery, consider  
18 the filing of any dispositive motions, and engage in settlement discussions.

19           WHEREAS, the Parties believe that at least a three (3) month extension of the deadlines to  
20 complete discovery and bring a dispositive motion is needed to complete discovery, prepare this  
21 matter for trial, and engage in alternative dispute resolution.

22           WHEREAS, on or around February 23, 2024 and May 15, 2024, the Court granted a request  
23 to continue the aforementioned pre-trial and trial dates.

24           Now, therefore, IT IS HEREBY STIPULATED by and between the Parties to this action as

1 follows:

2 That the deadlines for the discovery cut-off and dispositive motion be extended, and if  
3 necessary, the trial and related dates be continued; and it is hereby requested by the Parties that this  
4 Court modify its Pretrial Scheduling Order, dated May 15, 2024, with the extended corresponding  
5 dates.

6 **IT IS SO STIPULATED.**

7 Dated: 11/18/2024

LAW OFFICES OF DENISE EATON-MAY,  
PC

11 By: /s/ Denise Eaton-May  
12 DENISE EATON-MAY  
13 Attorneys for Plaintiff  
ADRIAN ROMERO, JR.

14 Dated: 11/18/2024

15 Rob Bonta  
16 Attorney General of California  
17 Alice Quinton  
Supervising Deputy Attorney General

18 By: /s/ Rebecca O'Grady  
19 Rebecca M. O'Grady  
20 Deputy Attorney General  
21 Attorneys for Defendant CALIFORNIA  
HIGHWAY PATROL

22 SD2021304925

## **ORDER MODIFYING PRETRIAL SCHEDULING ORDER**

Based on the stipulation of the parties and good cause appearing, the Pretrial Scheduling Order, is **MODIFIED** as follows:

Event	Date
Last Day to Disclose Experts	March 1, 2024
Supplemental Expert Disclosure	April 12, 2024
Last Day of Discovery	<b>March 07, 2025</b>
Last Day to File a Dispositive Motion	<b>May 02, 2025</b>
Hearing on Dispositive Motion	<b>July 01, 2025, at 01:00 p.m.</b>
Joint Mid-Litigation Statement Filing Deadlines	Fourteen (14) days prior to the close of discovery
Final Pretrial Conference	<b>August 29, 2025, at 10:00 a.m.</b>
Trial (10-14 Days)	<b>October 20, 2025, at 09:00 a.m.</b>

All other instructions contained in the January 05, 2022, Pretrial Scheduling Order (ECF No. 13) shall remain in effect.

Dated: November 20, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE